

THE **DURRANT** LAW FIRM

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December 22, 2022

Via ECF

The Honorable Victor Marrero
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007

**Re: Nike, Inc. v. By Kiy LLC, et al., Case No. 1:22-cv-10176-VM – Agreed Request to
Extend Time to Respond to Complaint**

Dear Judge Marrero:

We represent defendants By Kiy LLC, Nickwon Arvinger, and David Weeks (collectively, “Moving Defendants”) each of whom agreed to accept service of process on December 8, 2022 making an answer or other response to the Complaint of plaintiff Nike, Inc. (“Nike”) due on December 29, 2022.

Moving Defendants and Nike have agreed to an extension of time to respond to the Complaint until February 6, 2023, which would make Moving Defendants response due the same day as the response of defendants Bill Omar Carrasquillo and Reloaded Merch LLC, who each accepted service by Waiver of Service.

Moving Defendants need more time to prepare their response and believe a uniform response date will simplify and organize the proceedings. No prior request for an extension has been made.

Moving Defendants therefore respectfully move that the Court extend the time for

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Moving Defendants to answer, move to dismiss, or otherwise respond to Nike's Complaint until February 6, 2023.

Respectfully submitted,

/s/ Zakari A. Kurtz

Zakari A. Kurtz, Esq. (Counsel of Record)
Principal Attorney
SNEAKER & STREETWEAR LEGAL SERVICES

/s/ John Durrant

John Durrant, Esq. (*pro hac vice application forthcoming*)
Founder and Chief Executive officer of
THE DURRANT LAW FIRM, APC